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March 19, 2015

Hon. Peter G. Sheridan, U.S.D.J.  
U.S. District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

RE: BRRAM, Inc., et al. v. FAA, et al.,  
Civil Action No. 3:14-cv-02686-JAP-DEA  
Renewed request for oral argument

Dear Judge Sheridan:

This law firm represents all of the plaintiffs in the above-captioned matter. This letter is submitted as the plaintiffs renewed request for oral argument on all the pending motions in this case.

On or about February 18, 2015 the Hon. Judge Joel A. Pisano, since retired, responded to the plaintiffs' earlier request for oral argument as follows: "Plaintiffs request for oral argument on the pending motions is denied without prejudice and may be resubmitted once this matter has been reassigned." See Exhibit 1

On March 9, 2015, the court issued an order as follows: "Case reassigned to Judge Peter G. Sheridan for all further proceedings. Judge Joel A. Pisano no longer assigned to case. So ordered by Chief Judge Jerome B. Simandle." See Exhibit 2.

Plaintiffs respectfully renew their request for oral argument for basically two reasons.

First, this case raises important environmental and safety issues concerning

(FAA) with the requirements of the National Environmental Policy Act (NEPA) concerning operations at the Trenton Mercer Airport.

Second, the respondents, notably the FAA and Frontier Airlines, have filed dispositive motions to dismiss for lack of subject matter jurisdiction; resolution of these motions involves determination of complicated legal and factual matters. Oral argument will assist the court in reaching a fully informed and just resolution of these issues.

Respectfully submitted,

          / s/ R. William Potter          

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